

ESTTA Tracking number: **ESTTA486310**

Filing date: **07/30/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91199085
Party	Defendant Reynolds Poulson Consulting, LLC
Correspondence Address	ZACHARY A WRIGHT WRIGHT LAW PLLC 999 THIRD AVENUE, SUITE 3000 SEATTLE, WA 98104-3180 UNITED STATES zwright@wright.pro,jjolley@wright.pro
Submission	Opposition/Response to Motion
Filer's Name	Zachary A Wright
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Signature	/Zachary A Wright/
Date	07/30/2012
Attachments	Applicant's Response to Summary Judgment Motion (Based on Withdrawal).pdf (3 pages)(8553 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of:

Mark : POLITICAL INTELLIGENCE
Serial No. : 85/069894
Publication Date : November 23, 2010

Ramiro Canales,

Opposer,

v.

Reynolds Poulson Consulting, LLC,

Applicant.

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) **Opposition No. 91199085**
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**APPLICANT'S RESPONSE TO
OPPOSER'S MOTION FOR SUMMARY JUDGMENT
(BASED ON PREVIOUSLY-FILED WITHDRAWAL OF OPPOSITION)**

Applicant Reynolds Poulson Consulting, LLC's response to a pending summary judgment motion is due on July 30, 2012 (calculated in accordance with 37 CFR § 2.196). Applicant has recently entered into a settlement agreement with Opposer. As a result, Opposer filed a Withdrawal of Opposition with Prejudice in this proceeding via the ESTTA system on July 17, 2012. The Withdrawal was properly served on Applicant's counsel.

The Withdrawal of Opposition appears in the TTABVUE system, but it has not yet been processed by the Board.

Given that Opposer has essentially withdrawn its summary judgment motion (along with the rest of this proceeding) through filing the Withdrawal, Applicant believes that it is not now required to file detailed legal arguments and evidence in response to Opposer's summary judgment motion at this time.

However, in the unlikely event that Opposer's Withdrawal is not accepted by the Board for some reason, Applicant respectfully requests that its time to respond to the pending summary

judgment motion be reset, with a deadline for 30 days from the date of the Board's order refusing to accept the Withdrawal. This additional time is in order to give Applicant the time to work with Opposer to address the reasons for any such refusal and/or prepare detailed legal arguments and evidence to respond to the summary judgment motion.

Applicant is providing an e-mail address for itself and for the opposing party (on the Certificate of Service page) so that an order related to this response (if any) may be issued electronically by the Board.

Dated: July 30, 2012.

Respectfully submitted,

WRIGHT LAW PLLC

/s/ Zachary A. Wright
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REYNOLDS POULSON CONSULTING, LLC

CERTIFICATE OF SERVICE

I, Zachary A. Wright, hereby certify that a true and complete copy of the foregoing Response to Summary Judgment Motion has been served on Opposer by mailing said copy, via first class mail, postage prepaid, as follows:

Ramiro Canales
NameLitigation.com
P.O. Box 49046
Austin, TX 78765
Email: rcanales@namelitigation.com

A copy is also being sent by email.

Dated: July 30, 2012

/s/ Zachary A. Wright
Zachary A. Wright